August 15, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave. SW
Room 4008 So., Ag Stop 0268
Washington, DC 20250

Dear Mr. Neal and National Organic Standards Board:

We are an Individual Quick Frozen (IQF) Onion processor located in the Columbia Basin, which is one of the largest onion production areas in the world. We supply many large companies who manufacture food products using onions as an ingredient. We have been certified since 1998, through Oregon Tilth Certified Organic, for organic onion processing. We are members of both the Northwest Food Processors Association and the American Frozen Food Institute.

This letter is in reference to the National Organic Program, Sunset Review, Docket Number TM-04-07. Boardman Foods, Inc. supports the continued allowance of chlorine materials, specifically, Sodium Hypochlorite, for organic food processing. Our decision is based upon the number of years, and the experience we have, in processing, as well as the documented research and testing that has been conducted throughout the food processing industry. We appreciate the opportunity to provide you with our renewal request, and supporting documentation, for review.

The United States' food supply is among the safest in the world, however, foodborne illnesses still affect millions of people each year. Boardman Foods, Inc. is committed to providing quality products to our customers, ensuring a safe product for them to provide to their customer, the final consumer.

Here is an outline that shows the advantages of using chlorine in our organic onion processing:

1. Food Contact Equipment Sanitizing

    a. Kills microorganisms on food surfaces within the first few seconds of application, reduces downtime.
    b. No corrosion of metal equipment, with continuous contact, when chlorine is used as a sanitizer.

2. Food Process - Microbiological Control

    a. Due to the fact that Chlorine "flashes off" and dissipates upon contact with organic matter, chances of residual sanitizer remaining in the finished product is significantly reduced when compared to other sanitizers in the food processing industry.

b. Chlorine is one of the few chemicals available to treat post harvest diseases. Many fungicides and bactericides are not allowed, due to environmental and/or health concerns.
c. Reduction of odor and slime during initial application—eliminates the need for additional chemical treatments, later in the process.

3. General Observations

a. Less expensive, therefore, lowered costs, when compared to other sanitizing agents.
b. Multiple-use Solution – Flumes water treatment, water tanks, spray washers, and coolers. Used for equipment sanitation, foot baths, hand sanitizers, plus many other "miscellaneous" uses.

Historically, chlorine has been used in the war against infectious waterborne diseases. To this day, it continues to be a constant, reliable source in the food processing industry. There is no other chemical that can compete with chlorine--especially for safe food production, with minimal residual, in the finished product.

In summary, Boardman Foods, Inc. recognizes the need to produce a safe product for public consumption. We also believe that chlorine products are a safe, and necessary, element in our production process.

Sincerely,

Deanna Goodeve, Quality Assurance Superintendent
Boardman Foods, Inc.

Cc: Organic Trade Association
National Organic Standards Board
Debbie Radie Operations Manager, Boardman Foods, Inc.

Attachment – Reference page